

STATEMENT OF BASIS

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0093149
to discharge to waters of the State of Louisiana.
AI No.: 42520 / Activity No.: PER20080002

THE APPLICANT IS: USA Truckstop, Inc.
985 Highway 80 East
Calhoun, LA 71225

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Bonnie Wascom

DATE PREPARED: November 19, 2008

1. PERMIT STATUS

- A. LPDES permit – LA0093149
LPDES permit effective date: July 1, 2003
LPDES permit expiration date: June 30, 2008
- B. LWDPS permit – NA
LWDPS permit effective date: NA
LWDPS permit expiration date: NA
- C. Date Application Received: February 25, 2008

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY – truck stop

This is an existing truck stop that provides fuel, food service, and personal sanitary services including showers and laundry washing equipment. The restaurant seats approximately 40 people and there are approximately 35 employees currently employed by this truck stop. There are no gaming devices at this facility. Sanitary wastewater from the restaurant, 4 showers, the washer, and the office is discharged via Outfall 001. Fuel pump washdown wastewater commingled with stormwater is intermittently discharged via Outfall 002.

B. FEE RATE

- 1. Fee Rating Facility Type: minor
- 2. Complexity Type: I
- 3. Wastewater Type: III
- 4. SIC code: 5541

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C. LOCATION - 985 Highway 80
 Calhoun, Ouachita Parish
 Latitude +32° 30' 46", Longitude -92° 21' 28"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: Treated sanitary wastewater

Treatment: Septic tank and oxidation pond

Location: at the point of discharge from the oxidation pond prior to mixing with other waters

Flow: (35 employees x 20 GPD) + (4 showers x 20 GPD) + (1 washer x 400 GPD) + (40 seats x 50 GPD) = 700 GPD + 80 GPD + 400 GPD + 2000 GPD = 3180 GPD

Discharge Route: by pipe to Curry Creek via local drainage (080802)

Outfall 002

Discharge Type: Fuel island washdown wastewater commingled with stormwater

Treatment: Fuel island washdown wastewater is treated by an oil/water separator

Location: at the point of discharge from the oil/water separator prior mixing with other waters of the state

Flow: 1400 GPD

Discharge Route: by pipe to Curry Creek via local drainage (080802)

NOTE: This facility discharges fuel island washdown wastewater commingled with stormwater which is not covered by any general permit; therefore, an individual permit will be issued.

4. RECEIVING WATERS

STREAM – Outfall 001 & Outfall 002– by pipe to Curry Creek via local drainage

BASIN AND SEGMENT – Ouachita River – Subsegment 080802

DESIGNATED USES -

- a. Primary contact recreation
- b. Secondary contact recreation
- c. Propagation of fish and wildlife

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5. EXISTING EFFLUENT LIMITS

1. **Outfall 001** – Treated sanitary wastewater from restrooms, showers, washers, and the restaurant

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max	<u>Monitoring</u>
Flow (GPD)	---: Report	Quarterly
TSS	---: 135 mg/l	Quarterly
Fecal Coliform	---: 400 Colonies/ 100 ml	Quarterly
BOD	---: 45 mg/l	Quarterly
Oil & Grease	---: 15 mg/l	Quarterly
pH	6.0 - 9.0 s.u.	Quarterly

2. **Outfall 002** – wash down wastewater from the fuel island

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max	<u>Monitoring</u>
Flow (GPD)	---: Report	Quarterly
TOC	---: 50 mg/l	Quarterly
Oil & Grease	---: 15 mg/l	Quarterly
pH	6.0 - 9.0 s.u.	Quarterly

6. PROPOSED EFFLUENT LIMITS

BASIS – See rationale below.

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

An inspection was conducted on **October 14, 2007** which revealed no permit was found on site. A warning letter was issued on **February 18, 2008** in response to the inspection.

B. DMR Review/Excursions

A DMR Review was conducted for the period of January 2005 – September 2008. 10 DMRs were on file for Outfall 001 which revealed 1 BOD excursion and Flow not reported on 2 DMRs. 9 DMRs were on file for Outfall 002 which revealed no excursions, Flow not reported on 1 DMR, and TOC, Oil & Grease, and pH not reported on 1 DMR.

8. ENDANGERED SPECIES

The receiving waterbodies and proposed discharge are not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck

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(FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

9. 303 (d) LISTED WATERBODIES

Subsegment 080802, Cheniere Brake Lake, is listed on LDEQ's Final 2006 303(d) List as impaired for dissolved oxygen/low DO (EPA Category 5) and mercury. To date no TMDLs have been completed for these impairments. TMDLs were to be completed in this basin in 2001. The dissolved oxygen/low DO and mercury impairments have been added subsequent to the original TMDL development. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for these impairments, those suspected causes for impairment which are not directly attributed to the truck stop point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. This facility is not expected to cause or contribute to the mercury impairment. This facility does have the potential to contribute to dissolved oxygen/low DO impairment. Limitations on BOD₅ are established in the permit.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

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Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for USA Truckstop, Inc.

1. Outfall 001 – Treated sanitary wastewater

<u>Pollutant</u>	<u>Limitation*</u> Mo. Avg: Daily Max	<u>Reference**</u>
Flow (GPD)	Report: Report	LAC 33:IX.2361.I.1.b
TSS	---: 135 mg/l	Similar discharges (BPJ)
BOD	---: 45 mg/l	Similar discharges (BPJ)
Oil & Grease	---: 15 mg/l	Similar discharges (BPJ)
Fecal Coliform	---: 400 colonies/ 100 ml	Similar discharges (BPJ)
pH	6.0 - 9.0 su	Similar discharges (BPJ)

Treatment: Septic tank and oxidation pond

***Monitoring Frequency:** Once per quarter for all pollutants at the point of discharge from the oxidation pond prior to mixing with other waters.

****Limits Justification:** For all parameters, limits and monitoring frequencies are based on the prior permit and current guidance for similar discharges.

2. Outfall 002 – Fuel island washdown wastewater commingled with stormwater

<u>Pollutant</u>	<u>Limitation*</u> Mo. Avg: Daily Max	<u>Reference**</u>
Flow (GPD)	Report: Report	LAC 33:IX.2361.I.1.b
TOC	---: 50 mg/l	Similar discharges (BPJ)
Oil & Grease	---: 15 mg/l	Similar discharges (BPJ)
pH	6.0 - 9.0 su	Similar discharges (BPJ)

Treatment: Fuel island washdown wastewater is treated by an oil/water separator

***Monitoring Frequency:** Once per quarter for all pollutants at the point of discharge from the oil/separator prior to mixing with other waters of the state.

****Limits Justification:** For all parameters, limits and monitoring frequencies are based on the prior permit and current guidance for similar discharges.

BPJ Best Professional Judgment
 GPD Gallons per Day
 su Standard Units

NOTE:

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

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Storm Water Pollution Prevention Plan (SWP3) Requirement

A SWP3 is included in the permit since there is a potential for storm water contamination from processes including vehicle fueling and windshield wash water.

The SWP3 shall be prepared and maintained within six months from the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see narrative requirements of the Draft Permit).

Monitoring Frequency

Please be aware that the Department has the authority to reduce monitoring frequencies when a permittee demonstrates two or more consecutive years of permit compliance. Monitoring frequencies established in LPDES permits are based on a number of factors, including but not limited to, the size of the discharge, the type of wastewater being discharged, the specific operations at the facility, past compliance history, similar facilities and best professional judgment of the reviewer. We encourage and invite each permittee to institute positive measures to ensure continued compliance with the LPDES permit, thereby qualifying for reduced monitoring frequencies upon permit reissuance. If the Department can be of any assistance in this area, please do not hesitate to contact us. As a reminder, the Department will also consider an increase in monitoring frequency upon permit reissuance when the permittee demonstrates continued non-compliance.